

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

: Plaintiff :

ANSWER

: v. :

Civil Action No. CV99-5871

VALERIE J. TRANUMN :

: Defendant :

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Valerie J. Tranumn, by her attorneys, BLS Legal Services, Corp., answers the complaint in the above captioned action as follows:

1. Admits the allegations contained in paragraph 1 of the complaint.
2. Admits the allegations contained in paragraph 2 of the complaint.
3. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 3 of the complaint.
4. Denies the allegations contained in paragraph 4 of the complaint.

WHEREFORE, defendant prays for dismissal of the complaint.

FIRST AFFIRMATIVE DEFENSE

1. Plaintiff's right to collect this debt is contingent on its compliance with the provisions of Title IV of the Higher Education Act, 20 U.S.C. § 1070 et seq, and the Higher Education Amendments of 1992, 20 U.S.C. § 1078 et seq.

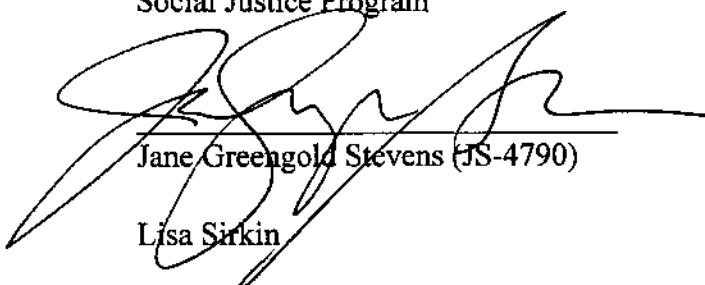
2. Prior to the date on which plaintiff filed this complaint, defendant Valerie Tranumn attempted to repay this debt. She sought to make monthly payments that were reasonable and affordable in light of her total financial circumstances, pursuant to 20 U.S.C. § 1078-6.

3. In violation of 20 U.S.C. § 1078-6, plaintiff's attorney refused to allow her to make payments that were reasonable and affordable.

WHEREFORE, defendant Tranumn respectfully asks this Court to dismiss this Complaint, and to direct plaintiff to allow defendant to repay the loan on terms that are reasonable and affordable in light of her total financial circumstances.

Dated: Brooklyn, New York
December 17, 1999

BLS LEGAL SERVICES CORP.
Social Justice Program



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